

May 29, 2012

Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street
Boston, MA 02108-4619

Attn: Linda Han, MD, MPH, Director
Bureau of Laboratory Sciences

Re: *Commonwealth v. [REDACTED]*
[REDACTED]

Dear Dr. Han:

Enclosed herewith is a self-explanatory letter, with enclosures, from Attorney Mulvaney regarding Annie Dookhan, a/k/a Annie Kahn. I have written to him today indicating that our file does not contain any of the information he requests in the fifth paragraph of his letter, namely, "all exculpatory materials bearing upon the Commonwealth's expert witness, Annie Dookhan, her handling of the Commonwealth's physical evidence offered at trial, and the DPH investigation mentioned in the Han letter."

Please advise whether your office has any such information.

Thank you in advance for your earliest attention to this matter.

Sincerely,

William Connolly

Assistant District Attorney

Dear Attorney Mulvaney:

This is in response to your letter, with enclosures, of April 11, 2012 . As you know, the enclosures to your letter refer to the protocols at the William A. Hinton State Laboratory Institute regarding drug samples being consistently followed, with the exception of ninety drug samples from Norfolk county.

Regarding your request of “all exculpatory materials bearing upon the Commonwealth’s expert witness, Annie Dookhan, her handling of the Commonwealth’s physical evidence offered at trial, and the DPH investigation mentioned in the Han letter,” please be advised that our file does not contain any such information.

Very truly yours,

William Connolly
Assistant District Attorney